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6 Attorneys for Plaintiff

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF ARIZONA

9 United States of America,
10 Plaintiff,
11 vs.
12 Hector Dominguez,
13 Defendant.
14

Mag. No. 20-08606M(JR)

STIPULATION AND JOINT MOTION
FOR RELEASE OF MATERIAL
WITNESSES WITHOUT TAKING
VIDEO DEPOSITION

15 The United States of America, through undersigned counsel, and the defendant,
16 individually and through counsel, do hereby agree and stipulate as follows:

17 1. Emma Angelica Lopez-Lopez and Roberto Coronado-Lopez (hereinafter
18 referred to as "material witnesses"), are not natural born or naturalized citizens, legal
19 permanent residents, or nationals of the United States;

20 2. The material witnesses entered the United States illegally on or about
21 February 25, 2020;

22 3. The material witnesses were transported in the vehicle where defendant
23 Hector Dominguez was a passenger;


24 4. The parties also jointly agree that as a result of this stipulation, the material
25 witnesses will be returned to their country of origin and thus unavailable as defined in Fed.
26 R. Evid. 804;

27 5. Therefore, the parties agree that the government may elicit hearsay testimony
28 from any agent regarding any statements made by the above-referenced material witnesses

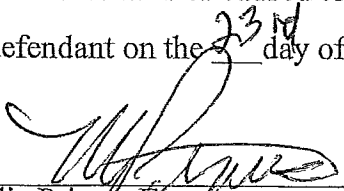
1 contained in the disclosure, and such testimony shall be admitted as substantive evidence
2 in any hearing or trial in the above captioned matter.

3 Based on the foregoing, the parties jointly move for the release of the above-named
4 material witnesses to the Department of Homeland Security for return to their country of
5 origin.

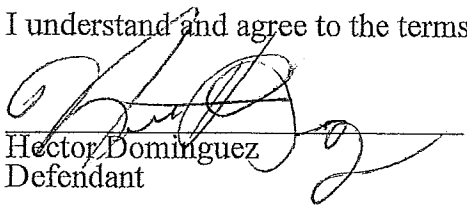
6 MICHAEL BAILEY
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8 District of Arizona

9 
10 CRAIG H. RUSSELL
11 Assistant U.S. Attorney

12 I translated or caused to be translated this agreement from English into Spanish to
13 the defendant on the 23rd day of March, 2020.

14 
15 Natalie Prince, Esq.
16 Attorney for Defendant

17 I understand and agree to the terms of this stipulation.

18 
19 Hector Dominguez
20 Defendant